

1 MICHAEL A. JACOBS (CA SBN 111664)  
MJacobs@mofo.com  
2 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
3 ERIC A. TATE (CA SBN 178719)  
ETate@mofo.com  
4 RUDY Y. KIM (CA SBN 199426)  
RKim@mofo.com  
5 MORRISON & FOERSTER LLP  
425 Market Street  
6 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
7 Facsimile: 415.268.7522

8 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsflp.com  
9 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsflp.com  
10 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
11 Washington DC 20005  
Telephone: 202.237.2727  
12 Facsimile: 202.237.6131

13 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
SYLVIA RIVERA IN SUPPORT OF  
DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S OPPOSITION  
TO WAYMO'S MOTION TO  
COMPEL FURTHER DISCOVERY  
RESPONSES**

Trial Date: October 10, 2017

1 I, Sylvia Rivera, declare as follows:

2 1. I am a partner with the law firm of Morrison & Foerster LLP, counsel of record for  
3 Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively "Uber") in this action. I  
4 am a member in good standing of the Bar of the State of California. I make this declaration in  
5 support of Uber's Opposition to Waymo's Motion to Compel Further Discovery Responses. I  
6 have personal knowledge of the facts contained in this declaration and, if called as a witness,  
7 could and would testify competently thereto.

8 2. Attached as **Exhibit 1** is a true and correct copy of relevant excerpts of Plaintiff's  
9 First Supplemental Objections And Responses To Uber's First Set Of Interrogatories (Nos. 1-11),  
10 dated July 13, 2017. **FILED UNDER SEAL**

11 3. Attached as **Exhibit 2** is a true and correct copy of relevant excerpts of Waymo's  
12 Cal. Civ. Proc. Code § 2019.210 Trade Secrets List, dated March 10, 2017. **FILED UNDER**  
13 **SEAL**

14 4. Attached as **Exhibit 3** is a true and correct copy of a document [REDACTED]  
15 [REDACTED] reviously filed under seal at Dkt. 25-20. **FILED UNDER**  
16 **SEAL**

17 5. Attached as **Exhibit 4** is a true and correct copy of relevant excerpts of Defendants  
18 Uber Technologies, Inc. And Ottomotto LLC's Objections And Responses To Waymo's First Set  
19 Of Expedited Requests For Production Pursuant To Paragraph Six Of May 11, 2017 Preliminary  
20 Injunction Order (NOS. 1-9), dated June 5, 2017. **FILED UNDER SEAL**

21 6. Attached as **Exhibit 5** is a true and correct copy of relevant excerpts of Defendants  
22 Uber Technologies, Inc. And Ottomotto LLC's Responses To Waymo's First Set Of Expedited  
23 Interrogatories Pursuant To Paragraph Six Of The May 11, 2017 Preliminary Injunction Order  
24 (NOS. 1-9), dated June 5, 2017. **FILED UNDER SEAL**

25 7. Attached as **Exhibit 6** is a true and correct copy of Defendants Uber Technologies,  
26 Inc. And Ottomotto LLC's Supplemental Responses To Waymo's First Set Of Expedited  
27 Interrogatories Pursuant To Paragraph Six Of The May 11, 2017 Preliminary Injunction Order  
28 (Nos. 5, 8), dated June 22, 2017. **FILED UNDER SEAL**

